

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**PAUL WILLOUGHBY, PHILLIP
DAVIS, AND CRYSTAL FOSTER-
GADSDEN FOR AND ON BEHALF
OF THEMSELVES AND OTHER
PERSONS SIMILARLY
SITUATED,**

Plaintiffs,

v.

YOUTH VILLAGES, INC.

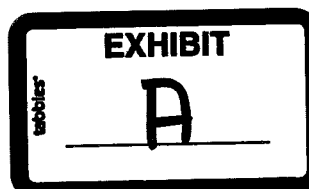
Defendant.

CIVIL NO. 1:13-cv-03910-SCJ

DECLARATION OF MANDI BENSON
PURSUANT TO F.R.E. 1006, SUMMARY OF VOLUMINOUS RECORDS

I, Mandi Benson, declare and state as follows:

1. I am a competent adult and have personal knowledge of the facts contained in this declaration.
2. I am employed by Jackson Lewis P.C. as a paralegal.
3. I was requested to review and summarize records containing offers of settlement, Plaintiffs' expert report and the ultimate settlements achieved in each of Plaintiffs' cases. I was requested to include in these charts a comparison between the Plaintiffs' initial demands made through their expert, Matthew



Thompson, against actual settlements entered into with each Plaintiff as are contained in the records of this case. All of these records had already been made available for inspection by Plaintiffs' counsel, are of record, or are in the possession and control of Plaintiffs' counsel.

4. Attached hereto as Exhibit 1 is a chart comparing settlement amounts paid to the fifty-three Plaintiffs and opt-ins (hereinafter "Plaintiffs") with the damages amounts provided by Plaintiffs' expert, Matthew Thompson, in his report dated February 16, 2015, along with liquidated damages.

5. The "Amounts Paid to Plaintiff" column, added to the "Amounts Paid to Plaintiffs' Counsel" column, created the amounts shown in the "Total Settlement Amount Paid" column. The amounts shown in those columns were taken from the Settlement Agreements executed by the Plaintiffs, except for that of Telleah Davis, which was taken from the Notice of Acceptance of Offer of Judgment (D.E. 114-2). All are "of record" with the Court and approved by the Court.

6. The amounts contained in the "Plaintiffs' Expert Analysis 2/16/15 (Table 2)" column were taken from Appendix B, Table 2, attached to Mr. Thompson's expert report filed on June 22, 2015 (D.E. 120-5). Those amounts were also the basis for the "Liquidated Damages" column. The "Plaintiffs' Expert Analysis + Liquidated Damages" column shows the sum of the prior two columns.

7. The “Paid v. Analysis (+ Liquidated Damages)” column reflects the difference in the total settlement amount paid and the Plaintiffs’ expert analysis figures, including liquidated damages.

8. The “% of Analysis (+ Liquidated Damages) that was paid” column provides the percentage of the Plaintiffs’ expert analysis figures, plus liquidated damages, satisfied by the settlement amounts paid to Plaintiffs. As reflected on Exhibit 1, the average amount of recovery for Plaintiffs in relation to Plaintiffs’ initial demands is 23.87%.

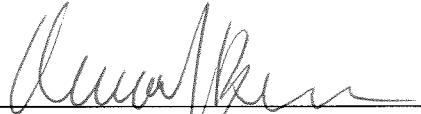
9. Attached hereto as Exhibit 2 is a pie chart created from information contained in Exhibit 1, showing the percentage of Plaintiffs’ expert analysis that was satisfied by the settlement payments.

10. Attached hereto as Exhibit 3 is a summary of Plaintiffs dismissed or settled with prior to mediation summarized from the records of these cases.

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Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23rd day of May, 2016.



MANDI BENSON

4811-1237-4322, v. 1

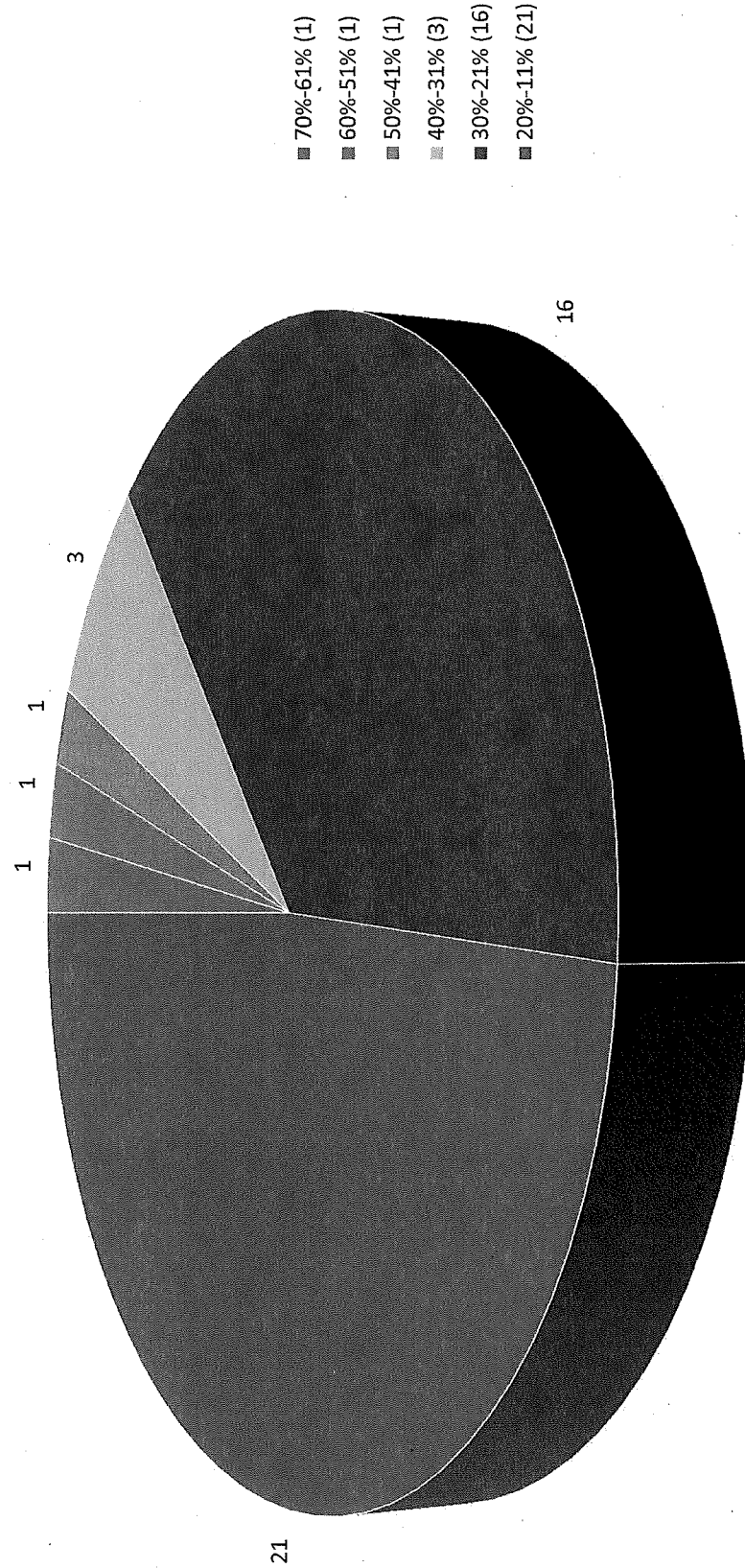
	Amount Paid to Plaintiffs	Amount Paid to Plaintiffs' Counsel	Total Settlement Amount Paid	Plaintiffs' Expert Analysis 2/16/15 (Table 2)	Liquidated Damages	Plaintiffs' Expert Analysis + Liquidated Damages	Paid v. Analysis (+ Liquidated Damages)	% of Analysis (+ Liquidated Damages) that was paid
Armstead, Terence	\$ 4,722.82	\$ -	\$ 4,722.82	\$ 11,906.00	\$ 11,906.00	\$ 23,812.00	\$ (19,089.18)	19.83
Artumus, Bernard	\$ 422.00	\$ -	\$ 422.00	\$ 704.00	\$ 704.00	\$ 1,408.00	\$ (986.00)	29.97
Bice-McKelvy, Meranda	\$ 1,132.16	\$ -	\$ 1,132.16	\$ 3,090.00	\$ 3,090.00	\$ 6,180.00	\$ (5,047.84)	18.32
Bolton, Jessica	\$ 300.00	\$ -	\$ 300.00	\$ 660.00	\$ 660.00	\$ 1,320.00	\$ (1,020.00)	22.73
Booze, William	\$ 6,000.00	\$ -	\$ 6,000.00	\$ 7,685.00	\$ 7,685.00	\$ 15,370.00	\$ (9,370.00)	39.04
Bridges, Brian	\$ 4,999.08	\$ -	\$ 4,999.08	\$ 9,352.00	\$ 9,352.00	\$ 18,704.00	\$ (13,704.92)	26.73
Brown, Markus	\$ 4,461.22	\$ -	\$ 4,461.22	\$ 12,176.00	\$ 12,176.00	\$ 24,352.00	\$ (19,890.78)	18.32
Burgess, Charles	\$ 4,351.30	\$ -	\$ 4,351.30	\$ 10,498.00	\$ 10,498.00	\$ 20,996.00	\$ (16,644.70)	20.72
Caudle, Britt	\$ 1,424.54	\$ -	\$ 1,424.54	\$ 3,888.00	\$ 3,888.00	\$ 7,776.00	\$ (6,351.46)	18.32
Cham, Fannie	\$ 1,835.64	\$ -	\$ 1,835.64	\$ 5,010.00	\$ 5,010.00	\$ 10,020.00	\$ (8,184.36)	18.32
Cooper, Angela	\$ 29.00	\$ 200.00	\$ 229.00					
Craft, Ryan	\$ 1,879.60	\$ -	\$ 1,879.60	\$ 3,532.00	\$ 3,532.00	\$ 7,064.00	\$ (5,184.40)	26.61
Creekmore, Benjamin	\$ 786.28	\$ -	\$ 786.28	\$ 2,146.00	\$ 2,146.00	\$ 4,292.00	\$ (3,505.72)	18.32
Davis, Amber	\$ 1,792.40	\$ -	\$ 1,792.40	\$ 4,892.00	\$ 4,892.00	\$ 9,784.00	\$ (7,991.60)	18.32
Davis, Phillip	\$ 1,566.70	\$ -	\$ 1,566.70	\$ 4,276.00	\$ 4,276.00	\$ 8,552.00	\$ (6,985.30)	18.32
Davis, Telleah	\$ 1,019.18	\$ 600.00	\$ 1,619.18					
Dean, Patricia	\$ 2,629.98	\$ -	\$ 2,629.98	\$ 6,350.00	\$ 6,350.00	\$ 12,700.00	\$ (10,070.02)	20.71
Drake, Starsheema	\$ 319.00	\$ -	\$ 319.00	\$ 532.00	\$ 532.00	\$ 1,064.00	\$ (745.00)	29.98
Flood, Lavon	\$ 1,000.00	\$ 800.00	\$ 1,800.00					
Floyd, Travis	\$ 1,387.00	\$ -	\$ 1,387.00	\$ 1,214.00	\$ 1,214.00	\$ 2,428.00	\$ (1,041.00)	57.13
Gaddy, Chereese	\$ 533.00	\$ 500.00	\$ 1,033.00					
Gilstrap, John	\$ 1,177.59	\$ -	\$ 1,177.59	\$ 2,307.00	\$ 2,307.00	\$ 4,614.00	\$ (3,436.41)	25.52
Graham, Byron	\$ 2,322.21	\$ -	\$ 2,322.21	\$ 5,825.00	\$ 5,825.00	\$ 11,650.00	\$ (9,327.79)	19.93
Grant, Sherri	\$ 3,849.34	\$ -	\$ 3,849.34	\$ 7,913.00	\$ 7,913.00	\$ 15,826.00	\$ (11,976.66)	24.32
Haecker, Matthew	\$ 308.00	\$ -	\$ 308.00	\$ 512.00	\$ 512.00	\$ 1,024.00	\$ (716.00)	30.08
Harris, Brandon	\$ 1,752.10	\$ -	\$ 1,752.10	\$ 4,782.00	\$ 4,782.00	\$ 9,564.00	\$ (7,811.90)	18.32
Harris, Mary	\$ 488.00	\$ -	\$ 488.00	\$ 798.00	\$ 798.00	\$ 1,596.00	\$ (1,108.00)	30.58
Hayes, Lamar	\$ 2,646.83	\$ -	\$ 2,646.83	\$ 5,989.00	\$ 5,989.00	\$ 11,978.00	\$ (9,331.17)	22.10
Haynes, Marius	\$ 1,480.23	\$ -	\$ 1,480.23	\$ 4,040.00	\$ 4,040.00	\$ 8,080.00	\$ (6,599.77)	18.32
Hazelwood, Derrick	\$ 860.00	\$ -	\$ 860.00	\$ 1,691.00	\$ 1,691.00	\$ 3,382.00	\$ (2,522.00)	25.43
Hoxie, Fredrick	\$ 1,749.90	\$ -	\$ 1,749.90	\$ 4,776.00	\$ 4,776.00	\$ 9,552.00	\$ (7,802.10)	18.32

EXHIBIT 1

	Amount Paid to Plaintiffs	Amount Paid to Plaintiffs' Counsel	Total Settlement Amount Paid	Plaintiffs' Expert Analysis 2/16/15 (Table 2)	Liquidated Damages	Plaintiffs' Expert Analysis + Liquidated Damages	Paid v. Analysis (+ Liquidated Damages)	% of Analysis (+ Liquidated Damages) that was paid
Jackson, Bethany	\$ 350.00	\$ 800.00	\$ 1,150.00					
Jordan, Jasmine	\$ 2,303.89	\$ -	\$ 2,303.89	\$ 6,033.00	\$ 6,033.00	\$ 12,066.00	\$ (9,762.11)	19.09
Liner, Steven	\$ 4,209.87	\$ -	\$ 4,209.87	\$ 10,053.00	\$ 10,053.00	\$ 20,106.00	\$ (15,896.13)	20.94
Lockett, Janaye	\$ 4,714.14	\$ -	\$ 4,714.14	\$ 12,940.00	\$ 12,940.00	\$ 25,880.00	\$ (21,165.86)	18.22
Manning, Portia	\$ 1,538.12	\$ -	\$ 1,538.12	\$ 4,198.00	\$ 4,198.00	\$ 8,396.00	\$ (6,857.88)	18.32
McDougle, Kathy	\$ 960.00	\$ -	\$ 960.00	\$ -	\$ -			
McDowell, Suzette	\$ 640.00	\$ -	\$ 640.00	\$ -	\$ -			
Reid, Steve	\$ 6,000.00	\$ -	\$ 6,000.00	\$ 7,164.00	\$ 7,164.00	\$ 14,328.00	\$ (8,328.00)	41.88
Sawadogo, Tahira	\$ 487.00	\$ -	\$ 487.00	\$ 812.00	\$ 812.00	\$ 1,624.00	\$ (1,137.00)	29.99
Schwam, Rebecca	\$ 500.00	\$ -	\$ 500.00	\$ 1,244.00	\$ 1,244.00	\$ 2,488.00	\$ (1,988.00)	20.10
Sims, Jerry	\$ 500.00	\$ -	\$ 500.00	\$ 1,092.00	\$ 1,092.00	\$ 2,184.00	\$ (1,684.00)	22.89
Smith, Golden	\$ 729.86	\$ -	\$ 729.86	\$ 1,992.00	\$ 1,992.00	\$ 3,984.00	\$ (3,254.14)	18.32
Starr, Alton	\$ 378.00	\$ -	\$ 378.00	\$ 630.00	\$ 630.00	\$ 1,260.00	\$ (882.00)	30.00
Stephenson, Jamie	\$ 4,000.00	\$ -	\$ 4,000.00	\$ 3,190.00	\$ 3,190.00	\$ 6,380.00	\$ (2,380.00)	62.70
Stevens, Nicole	\$ 1,910.38	\$ -	\$ 1,910.38	\$ 5,214.00	\$ 5,214.00	\$ 10,428.00	\$ (8,517.62)	18.32
Sykes, Leah	\$ 29.00	\$ 200.00	\$ 229.00					
Thompson, David	\$ 480.00	\$ -	\$ 480.00	\$ -	\$ -			
Tramble, Donesha	\$ 500.00	\$ -	\$ 500.00	\$ -	\$ -			
Ventre, Stephen	\$ 3,757.01	\$ -	\$ 3,757.01	\$ 10,254.00	\$ 10,254.00	\$ 20,508.00	\$ (16,750.99)	18.32
Waugh, Rebecca	\$ 718.87	\$ -	\$ 718.87	\$ 1,962.00	\$ 1,962.00	\$ 3,924.00	\$ (3,205.13)	18.32
Williams, Marcia	\$ 500.00	\$ -	\$ 500.00	\$ 762.00	\$ 762.00	\$ 1,524.00	\$ (1,024.00)	32.81
Willoughby, Paul	\$ 1,659.77	\$ -	\$ 1,659.77	\$ 4,530.00	\$ 4,530.00	\$ 9,060.00	\$ (7,400.23)	18.32
	\$ 96,091.01	\$ 3,100.00	\$ 99,191.01	\$ 198,614.00	\$ 198,614.00	\$ 397,228.00	\$ (298,036.99)	24.97
							Average:	Avg. % Paid:
							\$ (7,407.38)	23.87

EXHIBIT 1

Percentage of Plaintiffs' Expert Analysis Paid by Settlement



The numbers in parentheses following the respective percent ranges indicate the number of Plaintiffs whose settlement amount satisfied a percentage of their demand within the specified range. For example, there were three Plaintiffs whose settlements constituted between 31% and 40% of their respective demands.

Name	Date Dismissed	Reason
Foster-Gadsden, Crystal	04/29/14	Voluntary Stipulation of Dismissal
Brinkley, Sherilyn	02/09/15	Joint Motion to Dismiss Certain Opt-Ins
Chisholm, Ariel	02/09/15	Joint Motion to Dismiss Certain Opt-Ins
McNair, Ronald	02/09/15	Joint Motion to Dismiss Certain Opt-Ins
Simmons, Chardai	02/09/15	Joint Motion to Dismiss Certain Opt-Ins
Cooper, Angela	04/28/15	Settled
Davis, Telleah	04/28/15	Settled
Flood, Lavon	04/28/15	Settled
Gaddy, Cherese	04/28/15	Settled
Jackson, Bethany	04/28/15	Settled
Sykes, Leah	04/28/15	Settled